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Norman H. Bangerter
GovernorSuzanne Dandoy, M.D., M.P.H.
Executive Director

BSHW-9585-26

February 24, 1987

Paula Schmitt diel
U.S. EPA, Region VIII
One Denver Place, Suite 1300
999 18th Street
Denver, CO 80202-2413

Dear ~~Ms.~~ *Paula* Schmitt diel:

The following are the State's comments on the Analytical Results of Air Sampling, Richardson Flat, Park City, Utah. EPA verbally requested that these comments be prepared on February 19, 1987.

The majority of the State's comments on the sampling effort were prepared on December 30, 1986 in response to the Sampling Activities Report. These comments remain valid and are attached. Additional State comments follow.

E&E should have copy of this as well as response.
Text

- Table 3 of the text should have the same data qualifiers as Table 1.
- The data in Table 3 imply that the airborne concentrations of contaminants are at the laboratory's detection limit for analyses where the analyte was undetected. This portrayal is misleading.
- The SAS data validation package states that the air data is preliminary, pending action or verification. Has the action or verification been performed?

SI Form

- No population figures are given for ground water, direct contact, drinking water contamination, worker exposure/injury, population exposure/injury, or unstable containment of wastes.
- The NPDES permit cited in Part 4 of the SI form is for the Ontario Tunnel. The Richardson Flat site is not permitted for discharge.

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- The Silver Creek drainage just below the tailings dam is an important wetlands resource. The SI form, Part 5, should be updated to reflect this.
- The demographics section of Part 5 should be updated to reflect the recent construction at Prospector Square.
- While annually there is negative net precipitation at the site, there is positive net precipitation during the winter months.

If you have any questions regarding these comments, please call John Trepanowski of my staff at (801) 538-6170.

Respectfully yours,


Loretta Pickerell
Superfund Program Manager

LP/JT/pw